

SANTA MONICA MOUNTAINS CONSERVANCY

RAMIREZ CANYON PARK
5750 RAMIREZ CANYON ROAD
MALIBU, CALIFORNIA 90265
PHONE (310) 589-3200
FAX (310) 589-3207



October 27, 2003

Ms. Maya E. Zaitzevsky
Department of City Planning
200 N. Spring Street, Room 763
Los Angeles, California 90012

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UNIT

**Draft Environmental Impact Report
for the Canyon Hills Project
EIR No. ENV-2002-2481-EIR, SCH No. 2002091018**

Dear Ms. Zaitzevsky:

The proposed Canyon Hills development project in the City of Los Angeles is located within the Rim of the Valley Trail Corridor portion of the Santa Monica Mountains Conservancy (Conservancy) jurisdiction. The Santa Monica Mountains Conservancy (Conservancy) is concerned about potential significant adverse impacts to the visual, biological, and recreational resources located on the project site, adjacent parklands, and the Verdugo Mountains ecosystem.

4-1

Alternatives

None of the Draft Environmental Impact Report (DEIR) alternatives are both consistent with the General Plan and compatible with wildlife movement both locally and regionally. It is unclear in the DEIR which alternative is considered the Environmentally Superior Alternative.

4-2

An alternative must be added that 1) removes all development from Area B south of the 210 Freeway and 2) provides a functional wildlife movement corridor between the northwestern and southeastern portions of Area A, north of the 210 Freeway.

4-3

Preserving Area B is the only method to adequately protect the intermountain range wildlife movement corridor between the San Gabriel Mountains through Tujunga Wash to the Verdugo Mountains, including that portion south of La Tuna Canyon Road. The project as it is currently designed effectively blocks this north-south movement corridor. La Tuna Canyon Park, which is owned by the Conservancy, lies adjacent to the entire southern border of the project site on the south side of La Tuna Canyon Road. The wildlife movement study in the DEIR found evidence of gray fox, coyote, deer, and raccoon

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attempting to cross La Tuna Canyon Road at the intersection of the project site and the parkland.

4-4

The DEIR states that the regional wildlife movement corridor would not be impacted by the project. We do not concur with this statement. The proposed project footprint would force wildlife moving between Big Tujunga Wash and the core habitat of the Verdugo Mountains to cross La Tuna Canyon Road offsite through the much smaller gap to the west of the project site. The slopes on either side of the road are very steep making wildlife movement difficult. While some of the land on the northern side of the road is owned by the Los Angeles County Flood Control District, none of the land on the south side of the road is publicly owned. Also, the wildlife movement study in the DEIR found only one dead coyote at this interface. In contrast, evidence in the DEIR shows wildlife are traversing La Tuna Canyon Road where the project boundary and La Tuna Canyon Park meet.

4-5

The DEIR also found considerable wildlife movement within Area A, north of the 210 Freeway. As proposed, the northwestern half of Area A will be preserved as open space and the southeastern half will be developed. This design for the proposed project will biologically isolate the open space in the northwestern half of Area A. The proposed project footprint blocks wildlife movement between the northwestern portion of Area A and the freeway underpass at La Tuna Canyon Road. The La Tuna Canyon Road underpass is located at the southeastern corner of Area A. This underpass connects Area A to the rest of the Verdugo Mountains south and west of the 210 Freeway. To prevent the complete isolation of the open space in the northwestern half of Area A, a functional wildlife corridor must be provided through the development footprint of Area a. This corridor must be a minimum of 500 feet in width to be ecologically effective with residences on both sides.

4-6

Visual Impacts

We concur with the DEIR that impacts on the scenic vistas and resources along the 210 Freeway and La Tuna Canyon Road are significant and adverse. These impacts are unavoidable and unmitigatable under the proposed project.

4-7

While the DEIR states that the viewshed of La Tuna Canyon Park will be adversely affected by the development in Area B (under Photo Simulation 8), the impacts to the park are not explicitly described in any of the summaries. The proposed project will impact the viewshed of many of the hiking trails on the adjacent parkland. The alternative we proposed in the preceding section will eliminate the impacts created by the development of Area B.

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The DEIR is inadequate and deficient for failing to include a visual simulation of the main access road to Area A from La Tuna Canyon Road. This entrance will have to traverse an extremely steep slope that runs along the 210 Freeway for over 3,000 feet. The resulting grading will greatly impact the viewshed of the 210 Freeway, La Tuna Canyon Road, and La Tuna Canyon Park. The DEIR does not adequately describe how high the cut slopes of this entrance road will have to be.

4-9

Wildlife Movement Corridors

The DEIR states that a wildlife movement study was conducted from March 2002 to December 2002. It is unclear how many days during this period the site was surveyed and specifically which areas of the project site the surveys were conducted. This study included placing track stations in locations that were determined to be potentially important for wildlife movement. However, the track stations were set up for only four consecutive days. Four consecutive days is an insufficient sample size to make any determinations about wildlife movement within the region. The corridors must be studied over time through all of the seasons to begin to make determinations about the lack of significance of the project site as a wildlife movement corridor. While it is easy to conclude the presence of a species on a project site, the reverse is not true. The DEIR conclusions based on these studies are therefore deficient.

4-10

In fact, the data provided by the wildlife movement study in the DEIR shows the great extent the project site is utilized by medium-sized mammals. The study also confirms that the Wentworth Street underpass for the 210 Freeway is used by wildlife moving between Tujunga Wash and the Verdugo Mountains. The Verdugo Mountains are completely isolated from all other large tracts of habitat in the region, including those in the San Gabriel Mountains, except for this link at Wentworth Street and the point where the North Fork of Tujunga Wash crosses under the 210 Freeway. While this link is tenuous, it does not mean it is not functional. Its functionality has been proven by the referenced EIR study. The Conservancy also recently acquired several parcels at the southwestern corner of the Wentworth Street undercrossing. The DEIR states that fences in this area make it extremely difficult for wildlife to use the corridor. The tone in the text makes it seem like this is not a viable wildlife corridor. Fences can be moved, thereby opening up the corridor further. Native vegetation can also be added. Animals are traversing this area even with the fences.

4-11

Without actually tracking animals using radio telemetry, it cannot be accurately stated that the project site is mainly only utilized for localized wildlife movement. The points an animal is moving between cannot be determined by identifying a track or scat on a path.

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The development footprint for Area B completely cuts off movement between the northern and southern portions of that area of the project. The DEIR states that a local movement path will be provided through the central portion of Development Area B. The EIR shall remain deficient until this "local movement path" is accurately described and mapped for decision makers to review. To utilize this path, wildlife would have to move between the narrow portions of ungraded land on the southern edge of development in Area B. They would then have to move between two houses down a corridor the width of a driveway and then cross a road in the development. This is not an adequate wildlife movement corridor segment to keep the remainder of the Verdugo Mountains ecologically viable. This corridor is the only adequate means for wildlife to move between the publicly protected lands in the Verdugo Mountains and the San Gabriel Mountains. For these reasons, the wildlife corridor can adequately be protected only by preserving all of Area B.

4-13

The DEIR is deficient for stating that local movement pathways within the project site will not be impacted. Over 35 of the sightings in Area A occurred within the proposed grading limits of the project. The DEIR states that wildlife movement will be preserved by providing breaks in walls. Breaks in walls in between houses does not constitute a sufficient wildlife movement corridor. The figure depicting the corridors through the development forces the wildlife corridor onto private land near Drainage 4. This does not adequately protect a wildlife corridor totally encompassed within Area A. The maintenance of a wildlife corridor on adjacent private lands cannot be guaranteed and cannot be credited or relied upon to mitigate the subject project.

4-14

A wildlife movement corridor must be preserved through Area A connecting the northwestern and southeastern portions of the project site. This corridor must be a minimum of 500 feet in width to be ecologically effective with residences on both sides. Only roads would be allowed to traverse this corridor. Without this corridor, the northwestern corner of Area A would be totally isolated biologically. The wildlife movement study did not find any evidence of wildlife entering this portion of Area A from the north or via the culverts under the 210 Freeway. A fully protected corridor encompassed totally within the project site is the only means to ensure the protected open space in the northwestern corner is not completely isolated.

4-15

Biological Resources

We do not concur that mountain lions do not use the Verdugo Mountains. Residents in the Verdugo Mountains have sighted mountain lions. Until recently, the possibility of mountain lions regularly using the Santa Monica Mountains was not at all documented. Biologists and park personnel had not sighted a mountain lion, but residents had.

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Mountain lion presence in the Verdugo Mountains is at least as probable as it is improbable. In any case, mountain lions are a key component of the local ecosystem and land use decisions should protect existing and potential habitat.

4-16

The DEIR is deficient for not providing a discussion on the potential impacts of 1) the incremental reduction of habitat in the Verdugo Mountains ecosystem and 2) the increase in the urban-wildland edge on more secretive animals like the bobcat, mountain lion, and badger on the open space abutting the proposed development clusters.

4-17

A total of 230 oak trees and 27 sycamores will be impacted by the project. As proposed, replacement of the trees will be almost totally contained within the developed areas of the project site. For the most part, the trees would be planted along the edges of roads and in the yards of residents. This does not constitute adequate mitigation for the impacts to the trees. Replacement of trees in street medians and landscaping planters does not mitigate for the loss of the trees as habitat to wildlife on the project site. Impacts to oak trees must be mitigated by restoring degraded oak woodland habitat either on the project site outside of the development zone or in nearby protected natural areas.

4-18

The planting of a 2.5-acre water quality basin is proposed as the main mitigation for impacts to jurisdictional wetlands and riparian areas. For this to be mitigation, it must function similarly to the current riparian habitat on the project site. The DEIR however does not provide any details on the design of this water quality basin and how it will function. The EIR mitigation shall remain deficient until it includes a diagram of the basin that specifically outlines the plantings and dimensions. Decision makers must have this information to determine if the basin will adequately mitigate the impacts to riparian resources.

4-19

Project Approvals

As proposed, the project will require a General Plan Amendment and Zone Changes to increase the allowed 89 residences to be built on the project site to the proposed 280 homes. There is no public policy justification to allow for a General Plan Amendment and Zone changes. Eighty-nine clustered homes with the minimum allowed lot and pad size is the maximum the City should consider. The proposed project would irreparably harm the biological, aesthetic, and recreational resources of the City of Los Angeles.

4-20

The DEIR does not adequately address the need to obtain permits from Caltrans to construct the entrance road to Area A. This road will have to cross Caltrans slope easements. Likewise, the DEIR does not adequately address the access limitations created

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by the need to obtain such permits from Caltrans.

4-21

Lighting

We concur that the increase in light and glare from the project is a significant impact. The project will not only impact wildlife species on the project site and special status species offsite, but it will impact special status species located on the project site and nighttime wildlife movement in the area.

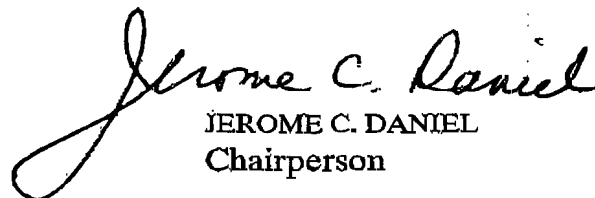
4-22

Every attempt should be made to keep lighting impacts to a minimum. While implementing measures F-1 and F-2 will reduce visual impacts from the road, it does not adequately mitigate the impacts of lighting on wildlife. F-1 should be changed to state, "that would be visible from existing communities, protected open space, or public roads." F-2 should be changed to state, "any lot located within 100 feet of Interstate 210 rights-of-way or protected open space." Other methods that should be considered for implementation include (1) the installation of low pressure sodium lights, which produce light in a spectrum that attracts the fewest number of moths and insects, (2) no roof-mounted lighting structures, (3) no light source exceeding 250 watts, (4) all exterior lighting directed downward, (5) the installation of lighting controlled by sensors, and (6) light sources not exceeding one footcandle of illumination shall be placed within 100 feet of the edge of development area next to any open space.

4-23

We appreciate the opportunity to comment. Please direct any questions and future correspondence to Susan Shanks of our staff at (310) 589-3200 ext. 124.

Sincerely,


 JEROME C. DANIEL
 Chairperson